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April 18, 2013

REFER TO FILE NO.

032605-149

VIA ECF

Honorable William J. Martini, U.S.D.J.
United States District Court for New Jersey
M.L. King, Jr. Fed. Bldg. & Courthouse
50 Walnut Street - Room 4076
Newark, New Jersey 07102

**Re: Patient Care Assocs., LLC a/s/o B.C., A.R. and K.W. v.
Nestlé Waters North America Inc.
Civil Action No. 13-cv-1480 (WJM)
Defendant's Motion to Dismiss Complaint
Motion Day: May 20, 2013**

Dear Judge Martini:

On behalf of defendant Nestlé Waters North America Inc. ("NWNA") in the above-captioned matter, I submit for Your Honor's consideration the accompanying Stipulation and Order to extend by one week -- from May 13 to May 20, 2013 -- NWNA's time to file and serve its reply papers in further support of NWNA's motion to dismiss plaintiff's complaint pursuant to *Fed. R. Civ. P.* 12(b)(6). Plaintiff has consented to this requested extension.

The reason for this consensual request is that plaintiff's invocation of the automatic, one-cycle extension of time to respond to NWNA's motion has adjourned the motion from May 6 to May 20 and, with it, the date for filing NWNA's reply brief to May 13, which is the date upon which our law firm's computer system will be converted to a brand new system. In order to effectuate this long-planned conversion project, our existing computer system will be deactivated on May 10, during the week prior to when NWNA's reply brief is presently due, and will remain completely shut down until at least May 13.

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In a proactive effort to avoid any complications arising from this computer system conversion, we have obtained plaintiff's consent to extend NWNA's time to file and serve its reply papers and respectfully request that Your Honor permit NWNA to file and serve its reply papers by no later than May 20, 2013.

Please note that this same request will be presented to Your Honor in connection with NWNA's reply in further support of its motion to dismiss the second amended complaint in Ciser v. Nestlé Waters North America Inc., Civil Action No. 11-cv-5031, which is also presently pending before the Court.

We thank Your Honor in advance for your kind consideration of this consensual request.

Respectfully yours,


JEFFREY M. GARROD

JMG:cal

Enclosure

cc: Andrew Bronsnick, Esq. (Via ECF & Regular Mail w/out encl.)